### **REMARKS**

Claims 1-20 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

## REJECTION UNDER 35 U.S.C. § 112

Claim 2 stands rejected under 35 U.S.C. § 112 for lacking sufficient antecedent basis. This rejection is respectfully traversed.

Minor amendments have been made to claim 2 to overcome this rejection. In particular, Applicants have amended claim 2 to recite "said SAM module."

# REJECTION UNDER 35 U.S.C. § 102

Claims 1-5, 7-14, and 16-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Dunham et al. (U.S. Pat. No. 6,854,035). This rejection is respectfully traversed.

Applicants have amended claim 1 to clarify that the SAM module "graphically represents said devices of said SAN <u>as icons</u> and links between said devices <u>as line segments</u>, wherein said SAM module allows <u>interaction with said icons and/or said line segments to</u> at least one of <u>add</u> a link between said devices, <u>remove</u> a link between said devices and <u>move</u> a link between said devices." In other words, the SAM module allows interaction with the graphical representations of the devices and/or links (i.e. icons and line segments, respectively) in order to manipulate the status of the links. Dunham does not show, teach, or suggest such a structure.

Dunham is directed generally to a method for managing a SAN. Dunham does not disclose allowing interaction with graphical representations of devices and/or links of the SAN to add, remove, or manipulate a link. Dunham discloses a display that shows SAN topology (FIG. 26; column 46, lines 40-50). The Examiner alleges that Dunham discloses adding (assigning) a link between said devices at column 40, lines 1-40. However, this cited section of Dunham merely discloses updating a graphical topology of the SAN to reflect added storage devices (column 40, lines 27-32) and detecting logical conflict with respect to device existence (column 40 lines 35-40). This is not analogous to allowing interaction with said icons and/or said line segments to add, remove, or move a link between said devices. In other words, here Dunham discloses graphically representing changes to topology. Similarly, the Examiner alleges that Dunham discloses removing a link between said devices at column 46, line 66 through column 47, line 11. Here, Dunham discloses updating the graphical topology to indicate status of components.

Further, the Examiner alleges that Dunham discloses moving a link between said devices. Here again, Dunham fails to disclose allowing interaction with graphical representations of devices and/or links to move links. At best, Dunham discloses a SAN manager 20 that allows assignment and unassignment of storage devices to/from hosts (column 22, lines 48-56), and that includes a GUI that presents SAN topology on a console (column 23, lines 23-26). The Examiner also cites column 25, lines 41-45, column 37, lines 20-30, and column 67, lines 28-46. Applicants respectfully note that the cited sections again fail to show, teach, or suggest the structure of claim 1. Dunham discloses a SAN manager that assigns and unassigns links, and a separate graphical

representation of the topology of the SAN. Dunham does not disclose the ability to add, remove, or move links between devices by interacting with the graphical representation of the devices and links. As such, Applicants respectfully submit that claim 1, as well as its corresponding dependent claims, is in condition for allowance. Applicants have amended claims 10 and 19 to include subject matter analogous to claim 1. Therefore, Applicants believe that claims 10 and 19, as well as their corresponding dependent claims, are allowable for the same reasons.

### REJECTION UNDER 35 U.S.C. § 103

Claims 6 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dunham et al. (U.S. Pat. No. 6,854,035) and further in view of Walker et al. (U.S. Pat. No. 6,594,696). This rejection is respectfully traversed.

Claims 6 and 15 depend from claims 1 and 10, respectively. Applicants believe that claims 1 and 10 are now in condition for allowance. Therefore, claims 6 and 15 should be allowable.

### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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